

ANDREA BANKS, CSBN 275286
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (510) 970-4803
Facsimile: (415) 744-0134
E-Mail: andrea.banks@ssa.gov
Attorneys for Defendant

TORRANCE CARR,

Plaintiff,

VS.

KILILO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01069-DJA

**UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE CERTIFIED
ADMINISTRATIVE RECORD AND ANSWER
(SECOND REQUEST)**

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by
2 and through her undersigned attorneys, hereby moves for a 10-day extension of time to file the Certified
3 Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s
4 Complaint are due to be filed by November 4, 2022. This is the Commissioner’s second request for an
5 extension of time.

6 Defendant submits that good cause exists for this extension request. On November 3, 2022, the
7 undersigned counsel for the Commissioner has confirmed this case is currently being processed by the
8 agency but the process is still not completed. More time is needed for the agency to respond to Plaintiff’s
9 complaint. Defendant respectfully requests a 10 day extension in which to respond to the Complaint until
10 November 14, 2022.

11 On November 3, 2022, the undersigned conferred with Plaintiff’s counsel, who has no opposition
12 to the requested extension.

13 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR
14 and answer to Plaintiff’s Complaint, through and including November 14, 2022.

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

1 Dated: November 4, 2022

2 JASON M. FRIERSON
United States Attorney

3 /s/ Andrea Banks
4 ANDREA BANKS
Special Assistant United States Attorney
Attorneys for Defendant

6
7 IT IS SO ORDERED:

8 
9 _____
UNITED STATES MAGISTRATE JUDGE

10 DATED: 11/7/2022
11 _____
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Leonard Stone
Shook & Stone, Chtd.
710 S Fourth Street
Las Vegas, NV 89101
702-385-2220
Email: lstone@shookandstone.com

Marc V Kalagian
Law Offices of Lawrence D. Rohlfing, Inc., CPC
12631 East Imperial Highway,
Suite C115
Santa Fe Springs, CA 90670
(562) 273-3702
Fax: (562) 868-5491
Email: marc.kalagian@rksslaw.com
Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2022

/s/ Andrea Banks
ANDREA BANKS
Special Assistant United States Attorney